## **EXHIBIT B**

**VIRGINIA** 

IN THE CIRCUIT COURT OF LOUISA COUNTY

WILLIAM FARLEY,

Plaintiff,

Case No. CL24000232-00

v.

WAL-MART STORES EAST, LP,

Defendant.

## **NOTICE OF FILING NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendant Wal-Mart Stores East, LP ("Walmart") hereby gives notice to the Circuit Court of Louisa County, and to the attorney of record for Plaintiff William Farley that on March 24, 2025, Walmart filed a Notice of Removal, thereby removing this action, formerly entitled *William Farley v. Wal-Mart Stores East, LP*, Case No. CL24000232-00, to the United States District Court for the Western District of Virginia. A copy of the Notice of Removal electronically filed on March 24, 2025 is attached hereto as **Exhibit A**. Pursuant to 28 U.S.C. § 1446(d), the filing of the Notice of Removal in the United States District Court for the Western District of Virginia, together with the filing of a copy of this Notice of Filing of Notice of Removal with this court, effects the removal of this action, and the Circuit Court for Louisa County may proceed no further unless and until the case is remanded.

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Dated: March 24, 2025 Respectfully submitted,

/s/ G. Bethany Ingle

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Counsel for Defendant

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on this 24<sup>th</sup> day of March 2025, a true and correct copy of the foregoing Notice of Filing Notice of Removal was served by email and first-class U.S. Mail, postage prepaid, upon the following:

Joshua Erlich (VSB No. 81298) Katherine L. Herrmann (VSB No. 83203) Heather E. Murray (VSB No. 89648) THE ERLICH LAW OFFICE, PLLC 2111 Wilson Blvd., Suite 700 Arlington, VA 22201

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Counsel for Plaintiff

/s/ G. Bethany Ingle

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